

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831-MFW

(Jointly Administered)

Hearing Date: October 5, 2023 at 10:30 a.m. (ET)

Objection Deadline: September 28, 2023 at 4:00 p.m. (ET)

**NOTICE OF EDWARD HIGHTOWER AND ADAM KROLL’S MOTION
FOR RELIEF FROM THE AUTOMATIC STAY, TO THE EXTENT
APPLICABLE, TO PERMIT PAYMENT, REIMBURSEMENT AND/OR
ADVANCEMENT OF DEFENSE COSTS AND FEES, AND RELATED EXPENSES,
UNDER DIRECTORS AND OFFICERS INSURANCE POLICIES**

PLEASE TAKE NOTICE that, on September 19, 2023, Edward Hightower and Adam Kroll filed a *Motion for Relief from the Automatic Stay, to the Extent Applicable, to Permit Payment, Reimbursement and/or Advancement of Defense Costs and Fees, and Related Expenses, Under Directors and Officers Insurance Policies* (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Bankruptcy Court**”).

PLEASE TAKE FURTHER NOTICE THAT responses or objections, if any, to the Motion must be filed on or before September 28, 2023, at 4:00 p.m. ET (the “**Objection Deadline**”) with the United States Bankruptcy Court for the District of Delaware, Clerk’s Office, 824 North Market Street, Third Floor, Wilmington, Delaware 19801 and served upon, so as to actually be received by, the undersigned counsel to Movants on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT a hearing on the Motion, if required, will be held on October 5, 2023, at 10:30 a.m. ET (the “**Hearing Date**”) before the Honorable Mary F. Walrath, United States Bankruptcy Judge, in the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom 5, Wilmington, Delaware 19801. Only responses and objections in writing and timely filed, served and received in accordance with this Notice will be considered by the Bankruptcy Court at this hearing.

PLEASE TAKE FURTHER NOTICE THAT, IF NO RESPONSES OR OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

Dated: September 19, 2023

Respectfully submitted,

/s/ Jennifer R. Hoover

Jennifer R. Hoover (DE No. 5111)

Steven L. Walsh (DE No. 6499)

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-and-

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Sarah Eichenberger (*pro hac vice* forthcoming)

Jonathan Rotenberg (*pro hac vice* forthcoming)

Cindi M. Giglio (*pro hac vice* forthcoming)

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